

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	Case No. 1:19-cv-09439-PKC
	:	
TELEGRAM GROUP INC. and TON ISSUER INC.,	:	
	:	
Defendants.	:	
	:	
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**NOTICE OF MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Lilya Tessler and the proposed brief *amicus curiae* attached thereto, and upon the accompanying Memorandum of Law, the Chamber of Digital Commerce shall move this Court, before the Honorable P. Kevin Castel, United States District Judge, at the United States Courthouse, 40 Foley Square, New York, New York, at a date and time to be determined by the Court, for leave to file the attached *amicus curiae* brief and granting such and further relief as the Court deems just and proper.

Dated: New York, New York  
January 21, 2020

Respectfully submitted,

By: /s/ Lilya Tessler  
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